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7 | Attorneys for Philip Christensen, as Receiver

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

11 METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation.

Plaintiff,

vs.

14 ACDF, LLC, a California limited liability
15 company, et al.,

Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:
1:24-cv-01226; 1:24-cv-01230; 1:24-cv-01231; 1:24-cv-01232; 1:24-cv-01233; 1:24-cv-01235; and 1:24-cv-01241

**DECLARATION OF ZEV SHECHTMAN
IN SUPPORT OF ENTRY OF ORDER
GRANTING MOTION TO APPROVE
DISBURSEMENT OF MANNING
ESTATE CROP PROCEEDS**

[No Hearing Required per Receivership Order,
Doc. No. 45, Paragraph 50]

- Affects All Cases
- Affects Metropolitan Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01261
- Affects Metropolitan Life Ins. Co. v. FNF Farms, LLC, et al., 1:24-cv-01226
- Affects Metropolitan Life Ins. Co. v. C & A Farms, LLC, et al., 1:24-cv-01230
- Affects Metropolitan Life Ins. Co. v. Maricopa Orchards, LLC, et al., 1:24-cv-01231
- Affects Brighthouse Life Ins. Co. v. Kamm South, LLC, et al., 1:24-cv-01232
- Affects Brighthouse Life Ins. Co. v. Manning Avenue Pistachios, LLC, et al., 1:24-cv-01233
- Affects Brighthouse Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235

Affects MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al., 1:24-cv-01241

DECLARATION OF ZEV SHECHTMAN

I, Zev Shechtman, declare as follows:

7 1. I am an attorney duly licensed to practice before all of the courts in the State of
8 California and this Court. I am a partner with Saul Ewing LLP, counsel of record for Philip
9 Christensen, as Receiver (the “Receiver”) in this action. I have personal knowledge of the facts
10 set forth in this Declaration and, if called as a witness, could and would competently testify to
11 such facts under oath.

12 2. On September 18, 2025, I filed the Motion for entry of an order approving the
13 disbursement of proceeds arising from crops grown in 2023 and 2024 (the “Motion”) in the above-
14 the above-captioned Receivership Case, *Brighthouse Life Ins. Co. v. Manning Avenue Pistachios,*
15 *LLC, et al.*, 1:24-cv-01233 (the “Manning Estate”), on behalf of the Receiver. See ECF No. 165.

16 3. On September 24, 2025, U.S. Bank filed its document styled as a “limited”
17 opposition to the Motion. ECF No. 172. In its limited opposition, U.S. Bank stated, “U.S. Bank
18 does not object to the Receiver’s specific request for disbursement of the crop proceeds of the
19 Manning Estate (as defined in the Motion) as specifically requested in the Motion.

²⁰ || Id. at page 2, lines 6-7.

21 || 4. No other party filed a response to the Motion.

22 5. Pursuant to paragraph 50 of the Appointment Order (ECF No. 45):

23 "If no party-in-interest files a written objection to the proposed action or form of
24 Order within the Response Time, the Receiver may submit such Order for entry by
the Court, supported by a declaration attesting that no objections were filed."

25 6. Although the limited objection was styled as an “objection,” in light of U.S. Bank’s
26 substantive statement that it does not object to the relief requested in the Motion, I hereby submit
27 that there is no objection pending before this Court requiring a hearing within the meaning of the
28 Appointment Order. Nor did U.S. Bank request a hearing.

7. Accordingly, I hereby submit this declaration along with the proposed order and respectfully request that the Court enter the proposed order without need for a hearing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 1st day of October, 2025, at Los Angeles, California.


Zev Shechtman

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case. My business address is: **Saul Ewing
1888 Century Park East, Suite 1500, Los Angeles, CA 90067.**

A true and correct copy of the document entitled: **Declaration of Zev Shechtman in Support of Entry of Order Granting Motion to Approve Disbursement of Manning Estate Crop Proceeds** will be served or was served on the judge in chambers in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING

(NEF): The foregoing document will be served by the court via NEF and hyperlink to the document. On **October 1, 2025**, I checked the CM/ECF docket for this case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On October 1, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FAXCIMILE

TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 on October 1, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

October 1, 2025 Hannah Richmond /s/ Hannah Richmond
Date Printed Name Signature

1 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING
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